

# Dartford Local Plan Pre- Submission (Publication) September 2021 Town and Country Planning (Local Planning) England Regulations 2012 – Regulation 19 Representation Form

Representations on the Dartford Local Plan should be submitted by **5pm on Wednesday 27<sup>th</sup> October 2021. Late representations will not be accepted.**

Representations should be made using this form and submitted to Dartford Borough Council by email to [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or sent to: Planning Policy Team, Dartford Borough Council, Civic Centre, Home Gardens, Dartford, Kent DA1 1DR.

Additional copies of the form can be obtained from the Council's website at: <https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/new-local-plan>. Photocopies of blank forms can also be made.

Advice on how to make representations is provided in the guidance notes which accompany this form. You are strongly advised to read the guidance notes before completing this form. ***Please note that if you responded to the previous version of the Pre-Submission Local Plan February 2021, your previous representation will not be automatically carried forward and you will need to respond again.***

This form comprises 3 parts:

- Part 1: Your details
- Part 2: Your representation(s). Please fill out a separate sheet for each representation you wish to make. However, only fill in Part A once and send all representations in together.
- Part 3: Declaration

If you have any queries about this consultation, please contact the Planning Policy Team by emailing [localplan@dartford.gov.uk](mailto:localplan@dartford.gov.uk) or by phoning 01322 343213.

You only need to fill this section out once.

## Part 1: Your details

You only need to fill this section out once

	1. Personal details	2. Agent details (if applicable)
Title		Mr
Name		Matthew Woodhead
Organisation / group		DHA Planning
Address 1		
Address 2		
Address 3		
Postcode		
Telephone number		
Email address		

If you are replying on behalf of a group, how many people does it represent?

## Part 2: Representation

### For office use only

Consultee ID:

Agent ID:

Date Received: :

Please use a separate sheet for each representation

Name or Organisation:	DHA Planning
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**1. To which part of the Local Plan does this representation relate (please specify paragraph or policy number)?**

Paragraph

All

Policy

All

Policies Map

**2. Do you consider the Local Plan is:**

Please mark with a cross in the boxes as appropriate

(1) Legally compliant

Yes

X

No

(2) Sound

Yes

X

No

(3) Complies with the  
duty to co-operate

Yes

X

No

**3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.**

Please refer to representation made by DHA to the February 2021 Draft Local Plan dated April 2021

(Continue on a separate sheet / expand box if necessary)

**4. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 3 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

Please refer to representation made by DHA to the February 2021 Draft Local Plan dated April 2021

(Continue on a separate sheet / expand box if necessary)

Please note: In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

**5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in the examination hearing session(s)?**

No, I do not wish to participate in hearing session(s)

☐

Yes, I wish to participate in hearing sessions(s)

☒

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.**

Please refer to representation made by DHA to the February 2021 Draft Local Plan dated April 2021

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they may wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part 3: Declaration

### Data Protection

The personal information you provide on this form will be processed in accordance with the Data Protection Act 2018 and the Privacy and Electronic Communications (EC Directive) Regulations 2003. The information you provide will only be used for the purposes of the preparation of the Local Plan as required by the Planning and Compulsory Purchase Act 2004, and may be used by the Council to contact you, if necessary, regarding your submission. Under Regulation 22, we have a duty to send all representations to the appointed Planning Inspector. Your name, organisation name (if relevant), comments and town/parish of residence will be made available for public inspection when displaying and reporting the outcome of the statutory consultation stage and cannot be treated as confidential. You will not be asked for any unnecessary information and we will not publish any personal data beyond what is stated in this declaration.

**Please sign and date this form.** Forms signed electronically will be accepted.

### Declaration:

**By completing and signing this form, I agree to my name, organisation, town/parish of residence and representations being made available for public inspection.**

Signature:

Date:

18-Oct-2021

planning  
transport  
design  
environment  
infrastructure

**Dartford Borough Council Pre-Submission Reg 19 Local Plan Consultation**

**The Priory Centre Allocation (D6).**  
On behalf of the owners.

April 2021 – DHA/12688.



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# 1 Introduction

## 1.1 Purpose of this Report

- 1.1.1 This representation has been prepared on behalf of the owners of The Priory centre, Dartford in response to the Dartford Borough Council Regulation 19 Pre-Submission Dartford Local Plan, which runs until 9<sup>th</sup> April 2021.
- 1.1.2 The owners of The Priory Shopping Centre, Dartford are promoting it for continued allocation as part of the Local Plan review.

## 1.2 Background to the Site

- 1.2.1 The Priory Shopping Centre forms part of Dartford Town Centre and the Core Strategy (2011) identifies it as being an opportunity site for refurbishment, extension or re-development for retail and leisure use. Moreover, local policy encourages proposals for re-development where it would provide enhanced retail and leisure facilities. The shopping centre is not identified for housing development but falls within the town centre 'Priority Area' where housing is encouraged. Not only this, the development plan is generally supportive of residential uses when they form part of transformational town centre development.
- 1.2.2 The level of priority given to expanding the town centre's residential community - and its contribution towards increasing local expenditure to support local shopping services - is a central consideration in the Local Plan review.
- 1.2.3 In this respect, the Councils current preferred option would be a renewed focus on the regeneration of brownfield sites in sustainable urban locations that are well served by public transport, with a particular emphasis on areas in and around the town centre where this would achieve; significant diversification of activities; a substantial new residential community; and the transformation of the attractiveness of Dartford town centre.
- 1.2.4 Based on the current national and local policy context, we consider Dartford town centre to be a suitable location to focus housing delivery. This approach would encourage sustainable travel choices and promote the effective use of brownfield land, which is consistent with national policy. Moreover, wider transformational benefits resulting from the redevelopment of the Priory Shopping Centre would contribute toward promoting the vitality and viability of Dartford town centre, which again is consistent with national policy.
- 1.2.5 The long-term viability of The Priory Shopping Centre over the plan period 2022 - 2037 is significantly challenged due to the structural changes being experienced by the widely-reported shifts in the UK retail market which has resulted in the closure of multiple stores and a general contraction in demand for traditional town centre retail floorspace.
- 1.2.6 The owners have taken proactive steps to ensure the short to medium term

success of the shopping centre. However, this may not be sufficient to safeguard the future as a predominantly retail-led scheme at its core when considered alongside other retail provision in the town.

### 1.3 Reg 19 Preferred Options Local Plan

- 1.3.1 The site is allocated within the Reg 19 Draft Local Plan under Policy D6<sup>1</sup> for mixed use development, with 'significant continuation of its existing retail functions'. The development is expected to deliver at least 400 dwellings, 10,000m<sup>2</sup> or more of retail/leisure/office floorspace (Class E), including both large and small retail units, as well as a Hotel (C1) and/or 4,000m<sup>2</sup> or more town centre attraction.
- 1.3.2 Having reviewed the proposal, as well as progressed design and feasibility matters, we consider that the site can and needs to provide a greater number of dwellings than is stated above.
- 1.3.3 Dialogue with the Council's Planning Policy Manager confirms that 400 dwellings can be seen as an approximate **minimum** number of dwellings that can be achieved on the site. We consider that perhaps 700+ dwellings, similar to the scheme submitted under pre-application reference: 19/00868/PREAPP, would be more appropriate and this still achieves the retention of key retail operators and the other mixed uses. By suggesting a number as low as 400 residential units (albeit as a minimum) is misleading in terms of what the site can sensibly achieve and may have viability consequences for the project as a whole. Once a number is adopted in a Local Plan any application which is forthcoming will be judged against this. Even though this is stated as a minimum it is a long way off what has been achieved through some detailed design work with officers in a pre-application process.

### 1.4 Legal Compliance

- 1.4.1 In terms of legal compliance, the main requirement for the early stages of Local Plan consultation are in relation to:
- *planning for community engagement;*
  - *the sustainability appraisal (including consultation with the statutory environment consultation bodies);*
  - *identifying significant cross boundary and inter-authority issues; and*
  - *ensuring that the plan rests on a credible evidence base, including meeting the Act's requirement for keeping matters affecting the development of the area under review.*
- 1.4.2 The Council has undertaken public consultation at various stages and has completed the required sustainability stages. At this stage we are confident that all legal requirements have been adhered to.

### 1.5 The Duty to Cooperate

- 1.5.1 The Duty to Cooperate (DtC) is a further legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended

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<sup>1</sup> Pre-Submission Dartford Local Plan February 2021:

[https://www.dartford.gov.uk/\\_data/assets/pdf\\_file/0016/1107052/Final-Publication-Plan.pdf](https://www.dartford.gov.uk/_data/assets/pdf_file/0016/1107052/Final-Publication-Plan.pdf)



by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process ongoing engagement and collaboration.

1.5.2 Information relating to the DtC is set out within the Council's 'Statement of Common Ground/Duty to Cooperate' Local Plan supporting document page<sup>2</sup> which sets out progress and status of the Council's Statements of Common Ground with neighbouring authorities. To date, progress is as follows:

- 'Duty to Cooperate 2020/2021';
- 'Signed Sevenoaks Statement of Common Ground';
- 'First Stage Statement of Common Ground with Bexley London Borough'.

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<sup>2</sup> Dartford Borough Council Statements of Common Ground / Duty to Cooperate:  
<https://www.dartford.gov.uk/by-category/environment-and-planning2/new-planning-homepage/planning-policy/evidence-base2>

## 2 The Site and Illustrative Proposals

### 2.1 Overview

- 2.1.1 The suitability of Priory Shopping Centre for residential led mixed-use development is outlined below, having regard to the site-specific constraints and opportunities.
- 2.1.2 We reiterate that the site has already been promoted within the Regulation 18 Draft Local Plan and this representation is made for the continued promotion of land with the Regulation 19 Local Plan, albeit with a greater number of proposed dwellings.

### 2.2 Location

- 2.2.1 The site is located within the Dartford town centre and comprises the Priory Shopping Centre, Sainsbury's and associated public car parks.
- 2.2.2 The site is located to the south of Spital Street, to the west of Lowfield Street and north of Instone Road. The site is approximately 3 hectares in size.



Figure 1: Approximate Site Location (Courtesy of Google Earth).

### 2.3 Planning Constraints

#### Noise and Air Quality

- 2.3.1 The site is adjacent to the Dartford Town Centre Air Quality Management Area and therefore the impact of poor air quality on future residents should be considered as well as how any additional impacts generated by the development might be mitigated.

- 2.3.2 In addition, the impact of noise arising from the town centre would need to be considered as well as noise impacts from the proposed uses. Mitigation would be incorporated into the design as necessary.

#### Flood Risk

- 2.3.3 The Dartford proposal maps identifies the site as forming part of a flood risk zone. The Environment Agencies flood map for planning confirms that it falls partly within flood zone 2 and partly within flood zone 3, albeit within an area benefiting from flood defences.
- 2.3.4 The above considered, any residential development would need to be located above ground floor level, with the less vulnerable retail and commercial uses below. Suitable means of escape would also need to be factored into the design to ensure the safety of residents in the event of a flood.

#### Vehicle Access and Car Parking

- 2.3.5 Safe and suitable vehicle access to the proposed parking facilities would need to be achieved and parking provided to serve the development proposed. Parking provision would be guided by the expected demand generated by the development and informed by evidence-based studies.

### ***Planning Opportunities***

#### Housing

- 2.3.6 The proposed development is allocated with the Reg 19 Draft Local Plan for some 400 dwellings. Having reviewed the sites constraints, commissioned further drawing work and explored feasibility further, we consider that it would be more appropriate if the site were to accommodate a minimum of some **700 dwellings** instead, and the 400 dwellings specified within the Reg 19 Draft Local Plan should be reconsidered. This statement is made having undertaken relatively detailed design feasibility studies and in discussions with the Council regarding appropriate heights and massing. It has also taken into account the other uses and parking needs.
- 2.3.7 Within the Pre-Submission Reg 19 Draft Local Plan, the LPA note that it must provide some 790 dwellings per annum over a 15 year period in order to meet their housing land supply figures. It is submitted that the development will provide a significant contribution to this figure, especially if a minimum 700 dwellings were to come forward. By not realistically allocating for the amount the site is suitable for risks the viability of the scheme as a whole remembering also that the plan period is until 2037.

#### Heritage and Townscape Impact

- 2.3.8 The site is close to the historic core of the Dartford Town Centre Conservation Area (herein 'the DTC Conservation Area') and although most of the shopping centre is set behind the historic street frontages, part of it does extend out to Spital Street and Lowfield Street.

2.3.9 In addition, there are several Listed Buildings in proximity to the site, these being:

- 'Beadles', Spital Street – Grade II Listed (entry no. 1387277);
- 'The Coach and Horses Public House', Spital Street – Grade II Listed (entry no.1116040);
- 'The Royal Victoria and Bull Inn', High Street – Grade II\* Listed (entry no.1086025);
- 'Methodist Church', Kent Road/ Spital Street – Grade II Listed (entry no.1086035);
- 'Alms-houses', Lowfield Street – Grade II Listed (entry no. 1320067);
- 'The Two Brewers Public House', Lowfield Street – Grade II\* Listed (entry no. 1336335);
- 'Kent House the County Court', Spital Street – Grade II Listed (entry no. 1336339); and
- '11 High Street' – Grade II Listed (entry no. 139304).

2.3.10 The impact of re-development on the significance of these designated heritage assets would need to be considered, and the design response would need to respond positively to the character of the area, whilst making efficient use of the land.

2.3.11 We do note that draft policy S1 (Borough Spatial Strategy) of the Regulation 19 Draft Local Plan is clear that heritage assets will be conserved and enhanced in a manner appropriate to their significance.

2.3.12 We consider that the site is currently somewhat outdated and does not contribute positively to the setting of nearby listed buildings. By redeveloping the site, it will allow greater pedestrian access to nearby listed buildings and the conservation area as well as improve their setting.

#### Improved Retail Offering

2.3.13 There is an opportunity to provide modern retail facilities, which would replace a purpose built (and now largely outdated) shopping centre complex that no longer meets consumer expectations. Further, opportunity exists to improve connectivity with the wider town centre and improve local spending with residential intensification.

#### Residential Intensification in a Sustainable Location

2.3.14 The Council's Strategic Land Availability Assessment ('SHLAA') identifies the site as having potential for significant residential development as part of a mixed-use town centre regeneration proposal. The Council suggest a potential capacity of 400 dwellings as a minimum within the Reg 19 Draft Local Plan; however, a minimum of 700 dwellings is considered to be appropriate provided high quality design is achieved.

2.3.15 We note that the Regulation 19 Draft Local Plan encourages further development and further provision of housing in the town centre. Paragraph 2.7 of the Reg 19 Draft Local Plan confirms that the LPA consider that there remains clear potential for the efficient use of brownfield land, combined with the location of jobs and homes in places where people are not heavily dependent on cars.

#### Improved Retail Frontages

- 2.3.16 Paragraph 3.57 of the Pre-Submission Reg 19 Draft Local Plan confirms that the redevelopment of the site provides an opportunity to enhance the active frontage of Home Gardens. This is a detail which will be explored further at Outline Planning Application Stage.

#### Improved Sustainable Transport Opportunities

- 2.3.17 As per Paragraph 3.56 of the Pre-Submission Reg 19 Local Plan, future development will explore how integration can be created with bus/fastrack services, for pedestrians to the town centre, and to/with the river and development north of the rail embankment.
- 2.3.18 As confirmed by the Draft Local Plan, Network Rail consider that there is potential for railway services to be increased and a replacement railway station / public transport interchange to be constructed on the adjacent Prospect Place retail park.
- 2.3.19 Paragraph 3.58 confirms that the redevelopment of Station Mount provides opportunities to re-profile levels and create an improved relationship to the Westgate Road / Hythe Street / Home Gardens junction and enable enhanced pedestrian and cycle routes to the town centre.

#### Public Realm Improvements, Public Art and Landscaping

- 2.3.20 There is an opportunity to not only provide housing and assist with town centre regeneration objectives, but to improve the quality of the town centre environment and public realm.

This could be achieved through the creation of new public squares and spaces, and to create a distinctive sense of place. This could be integrated with the Councils planned work for public realm improvements following grant funding from the Future High Streets Fund or any CIL receipts which are received.

### 3 Dartford Pre-Submission Reg 19 Local Plan

#### 3.1 Consultation Background and Policy Framework

3.1.1 The new Dartford Borough Local Plan sets out planning policies and proposals for new development in the Borough till 2037.

3.1.2 The draft Local Plan is split into 6 chapters which cover the Borough strategy and objectives, Central Dartford, Ebbsfleet and Swanscombe, Development Management Policies and implementation and monitoring. These culminate in the overall paraphrased vision:

*'Dartford Borough will be known across Kent, the Thames Estuary and beyond as a desirable and popular place to live, work and enjoy leisure time. Dartford will be recognised as well connected and served by good infrastructure and facilities, with a strong economy and new and existing towns and villages of acclaimed quality of life and prosperity.'*

*New development for economic and physical regeneration purposes, addressing social deprivation where found in neighbourhoods, will bring employment, facilities, and new infrastructure. Local residents will be able to access a diverse choice of homes to suit their needs at different stages of their life, through a range of accommodation available in a variety of types and tenures.*

*Retaining a clear sense of its history, Dartford Town Centre's streets, open spaces and riverside, will be engaging and elegant; creating a place that is easy and enjoyable to use, walk around and experience. The vibrancy of the Town Centre will be supported by a diversified economy, new premises and more residents living in the town. Dartford will be the community heart of the Borough with a thriving, creative and innovative ambience, with the mix of activities and its high quality environment giving many reasons to visit'.*

3.1.3 In preparing the Local Plan, it must accord with the National Planning Policy Framework (NPPF) is so far as it must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework.

- 3.1.4 In addition, to the above, the NPPF states<sup>3</sup> that: *"Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*
- a) Plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
  - b) Strategic policies should as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
    - I. the application of policies in this Framework that protect areas of assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
    - II. Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."*
- 3.1.5 It is important to note that the NPPF<sup>4</sup> requires for strategic policies to set out an overall strategy for the pattern, scale, and quality of development, and make sufficient provision for:
- a) housing (including affordable housing), employment, retail, leisure and other commercial development;
  - b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - c) community facilities (such as health, education and cultural infrastructure); and
  - d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.
- 3.1.6 It is clear from the above, that any Local Plan should set out a comprehensive and cohesive approach to future development.

## **3.2 Need**

- 3.2.1 The new Local Plan should, as a minimum, should provide for the objectively assessed needs for housing within the District (NPPF paragraph 11).
- 3.2.2 The starting point for achieving the appropriate level of housing growth is the Government's standard methodology. It is considered that to deliver less than the OAN would be contrary to the NPPF (2019) and Planning Practice Guidance, and

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<sup>3</sup> Paragraph 11, National Planning Policy Framework 2019

<sup>4</sup> Paragraph 20, National Planning Policy Framework 2019



no overriding negative impacts or constraints have been identified in evidence so far that would justify providing for less housing than the baseline housing growth.

- 3.2.3 The Planning Policy Guidance ('PPG') makes clear that the standard method only identifies the minimum number of homes required to meet population needs and does not take into account the variety of factors which may influence the level of new housing that is required in local areas, such as: changing economic circumstances, infrastructure proposals or other factors which may change demographic behaviour.
- 3.2.4 The Council's evidence should fully consider whether additional growth is expected to occur over the plan period, and this should be reflected in the policies of the plan. In circumstances where this is found to be the case, they should plan positively by including an appropriate uplift to the housing requirement to meet those needs in full. It is important that this uplift is undertaken prior to and separate from the consideration of the demographic baseline assessment of need. Circumstances where the need to apply an uplift may be appropriate include, but are not limited to:
- Where growth strategies are in place, particularly where those growth strategies identify that additional housing above historic trends is needed to support growth or funding is in place to promote and facilitate growth (e.g. housing deals);
  - Where strategic infrastructure improvements are planned that would support new homes;
  - Where an authority has agreed to take on unmet need, calculated using the standard method from neighbouring authorities, as set out in a statement of common ground;
  - Historic delivery levels where previous delivery has exceeded the minimum need identified it should be considered whether the level of delivery is indicative of greater housing need; and
  - Where recent assessments such as Strategic Housing Market Assessments suggest higher levels of need than those proposed by a strategic policy making authority, an assessment of lower need should be justified.
- 3.2.5 In establishing the scale of allocations that are required within the Plan to meet the minimum local plan housing target, the Council must build a suitable contingency into its housing allocations. The PPG<sup>5</sup> requires that when considering the deliverability of sites local authorities should apply a 10% buffer.
- 3.2.6 The LPA should seek additional units on sites such as the one in discussion. The subject site is an example of an underutilised town centre site which is highly sustainably located and with a viable scheme, such as would follow from development of a scale we have indicated, can contribute more efficiently to unit numbers whilst making a very positive contribute to townscape.

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<sup>5</sup> Paragraph: 010 Reference ID: 68-010-20190722, NPPG



### **3.3 Is the Proposal Consistent with National Policy?**

- 3.3.1 When concerning whether local policy pertinent to the development is in accordance with national policy, section 7 of the Framework is the main consideration.
- 3.3.2 We note that Paragraph 85 of the Framework is clear that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Policy D1 and D2 of the Pre-Submission Reg 19 Local Plan largely conforms to Section 7 of the Framework, insomuch as it seeks to provide flexible commercial premises which retain and enhance existing markets, reintroduce and create new markets and allocates a range of suitable sites in the town centre to meet the scale and type of development needed.
- 3.3.3 We do consider however that in order to conform to Section 7 of the framework, as well as improve pedestrian links, public realm, open spaces and access to the town centre, it is vital that the site pertinent to this representation remains allocated.
- 3.3.4 For the reasons that have been outlined above, we consider that the Council's approach is consistent with National Policy. Thus far the Council have the necessary evidence to underpin the proposed strategy.

## 4 Conclusion

- 4.1.1 This representation has been prepared on behalf of the owners of The Priory Centre in response to the Dartford Borough Council Regulation 19 Pre-submission Draft Local Plan consultation. Our client controls land which is subject to Policy D6 of the Reg 19 Pre-Submission Local Plan, which is zoned for a mix of uses.
- 4.1.2 As set out within our comments, we consider the Local Plan sets out a positive vision and framework for the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as providing the basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.
- 4.1.3 As discussed in Section 3, we consider that the site should provide further dwellings than that stated within the Reg 19 consultation Local Plan, whilst having a positive impact on townscape and nearby Listed Buildings.
- 4.1.4 We write to support the continued and proposed allocation of the site within the plan and continue to agree that it represents a logical and sustainable location to direct growth.
- 4.1.5 We therefore respectfully request that the LPA increase the potential number of residential units to a minimum of 700 dwellings as opposed to the stated 400 dwellings within the pre-submission Reg 19 Local Plan.